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10 UNITED STATES DISTRICT COURT
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12 DISTRICT OF NEVADA

13 JULIUS BRADFORD,
14 Petitioner,
15 vs.
16 WILLIAM GITTERE, et al.,
17 Respondents.

Case No. 2:13-cv-01784-RFB-GWF

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**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME
TO FILE EXHIBITS IN SUPPORT OF
RESPONDENTS' ANSWER TO
BRADFORD'S SECOND AMENDED
PETITION**

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(FIFTH REQUEST)

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Respondents move this Court for an enlargement of time of 7 days, up to and including April 1, 2019, in which to file their Index of Exhibits in Support of Respondents' Answer to Bradford's Second Amended Petition for Writ of Habeas Corpus. This Motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached affidavit of counsel.

This is the fifth enlargement of time sought by Respondents and is brought in good faith and not for the purpose of delay.

DATED March 25, 2019

Submitted by:

AARON D. FORD
Attorney General

By: /s/ Natasha M. Gebrael
NATASHA M. GEBRAEL (Bar. No. 14367)
Deputy Attorney General

DECLARATION OF NATASHA M. GEBRAEL

STATE OF NEVADA)
COUNTY OF CLARK) ss:

I, NATASHA M. GEBRAEL, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been assigned to represent Respondents in *Julius Bradford v. William Gittere, et al.*, Case No. 2:13-cv-01784-RFB-GWF, and as such, have personal knowledge of the matters contained herein.

The Response to the Second Amended § 2254 Petition (ECF No. 67) is currently due on March 25, 2019. I timely filed my response, but am requesting a brief extension of time in which to file the accompanying Index of Exhibits.

4. I have been unable with due diligence to timely file the Index, which contains a total of 580 exhibits. Due to the large number of exhibits, it is taking a significant amount of time to individually compress the exhibits to comply with the file-size restrictions, and break the total exhibits into the appropriate volume sizes. And, because one of our legal assistants was recently transferred to a new unit, the two remaining assistants are not only assisting me with the compression of the Index, but currently covering all administrative duties for our entire unit. In light of these concerns, I am requesting a brief enlargement of time in which to file the Index.

5. My office has contacted opposing counsel, Jeremy Baron, regarding this request, and he has no objection.

6. Based on the foregoing, I respectfully request an enlargement of time of 7 days, up to and including April 1, 2019, to file the Index of Exhibits in support of Respondent's Answer. This is my fifth request for an extension in this case, but the first request for extension in terms of the Index of Exhibits.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 25, 2019.

IT IS SO ORDERED:

/s/ Natasha M. Gebrael
NATASHA M. GEBRAEL (Bar No. 14367)

RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing ***UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE EXHIBITS IN SUPPORT OF RESPONDENTS' ANSWER TO BRADFORD'S SECOND AMENDED PETITION*** with the Clerk of the Court by using the CM/ECF system on March 25, 2019.

I certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

Jeremy Baron, Esq.
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/s/ C. Ross
An employee of the Office of the Attorney General